RE: National Animal Identification System (NAIS)

I would like to make a few comments on this program. First, I fully support NAIS and its implementation. I think that it is a general consensus for the most part that most all the facets of the livestock industry support the ability of someone or entity to track livestock in case of a foreign animal disease outbreak. The disagreement comes when we start talking about how the industries are going to implement the program across the country. In this country, as everyone is aware of, there are differences in opinion. However, for this system to work and function in the most unbiased manner, without controlling interest from one of many "voluntary" associations or organizations, USDA should be in control of this program.

Secondly, there has been a lot of discussion on mandatory versus voluntary implementation. In the beginning, until infrastructure is in place, a voluntary system will work, but farmers refuse for the most part to do anything unless they have to when it comes to programs like this. In order to achieve 48 hour trace back as described in the standards, only a mandatory program will work and I support a phased in program with mandatory premises registration to become effective first. With a voluntary program you will only receive partial information and not enough data to do the job you set out to do, in the first place.

Third, I would like to discuss the private vs. public system. The road seems to be split down the middle on this one. However, I support the USDA in taking care of the database for their needs. If private industry wants to hold production data, carcass data etc., then that is fine, but for NAIS purposes, USDA and the respective state should control the needed animal health data. Much has been said about confidentiality, however looking at the data requirements in the plan, there isn't anything required, for the most part, you can't
get out of your local phone book. You can go to your local county courthouse and find out what your neighbor borrowed on their house, there sure isn't any kind of information like
that here. The information in the database is very basic and you can not tell by the information, numbers owned, numbers sold, vaccinations, etc. I think most of the concern is misinformation and misunderstanding of what will be in the database.

Finally, I would like to comment a little on the cost. Yes it will be expensive, but can we afford not to develop and go forward. Look what it's cost our cattle industry already by not having a system in place. As it stands now, all consumers (taxpayers) are paying for it, through mostly federal money. If some of the "volunteer" associations or organizations would have their way the cost burden wouldn't be shared but put more on the backs of the producers, through tag surcharges, fees, etc. I support the current funding scheme and am against these organizations trying to boost their revenue through these surcharges.